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15 **UNITED STATES OF AMERICA**
16 **DISTRICT OF NEVADA**

17 DIJANA TRIFKOVIC,

18 *Plaintiff,*

19 v.

20 CLARK COUNTY CREDIT UNION,

21 *Defendant.*

Case Number: 2:24-cv-02406-JCM-EJY

**Stipulation and Order to Extend
Discovery [First Request]**

22 **I. Summary of Discovery Completed**

23 This case was filed on December 24, 2024.¹

24 The Order Granting the Stipulated Discovery Plan and Scheduling Order was filed on April
25 7, 2025.²

26 ¹ ECF 1.

27 ² ECF 18.

1 Both parties have exchanged their initial disclosures, Plaintiff on March 31, 2025, and
2 Defendant on April 17, 2024.

3 On March 31, 2025, Plaintiff served her First Request for Production and First Set of
4 Interrogatories.

5 On April 17, 2025, Plaintiff issued deposition notices pursuant to Fed. Civ. P. 30(b)(1) and
6 30(b)(6), with the first deposition scheduled to commence on May 19, 2025. Plaintiff also issued
7 a third-party subpoena directed to the Better Business Bureau.

8 On April 25, 2024, the Court granted the parties' Stipulation and Confidentiality Order,
9 which had been submitted to the Court the previous day.³

10 On May 5, 2025, following a brief extension, Defendant served responses and objections
11 to Plaintiff's demands.

12 On May 7, 2025, Plaintiff requested to meet and confer with Defendant regarding its
13 responses.

14 On May 14, 2025, Defendant served Requests for Admissions, Requests for Production
15 and Interrogatories on the Plaintiff. That same day, Defendant objected to certain aspects of the
16 Plaintiff's deposition notices.

17 On May 15, 2025, Plaintiff served a follow-up letter to Defendant regarding asserted
18 deficiencies in Defendant's discovery responses, and adjourned the previously noticed deposition
19 dates until the pending discovery disputes were resolved.

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27 ³ ECF 20.

On May 19, 2025, the parties held a Meet and Confer regarding various discovery disputes, which have yet to be resolved. However, at the Meet and Confer, Defendant indicated it would provide a document production to Plaintiff on or before May 26, 2025.

II. Discovery Remaining

Disputes have arisen regarding Plaintiff's First Request for Production, First Set of Interrogatories and Plaintiff's deposition notices, which have yet to be resolved. Plaintiff's responses to Defendant's first set of written discovery.

III. Why the Remaining Discovery Could not be Completed

The current discovery deadlines cannot be met because there are pending discovery disputes as well as the inherent delays with accessing responsive records and documents from banking institutions. If the disputes cannot be resolved via agreement of the parties, their resolution will require motion practice.

IV. Proposed Schedule for Completing All Remaining Discovery

Scheduling Item	Current Deadline	Proposed Deadline
Expert Disclosure	6/12/2025	9/12/2025
Rebuttal Expert Disclosure	7/14/2025	10/14/2025
All Discovery	8/11/2025	11/11/2025
Dispositive Motions	9/10/2025	12/10/2025
Pretrial Order	10/10/2025	1/19/2026

IT IS SO STIPULATED:

Dated: May 23, 2025

/s/Evan S. Rothfarb
Evan S. Rothfarb
Schlanger Law Group, LLP

Dated: May 23, 2025

/s/ Sean P. Flynn
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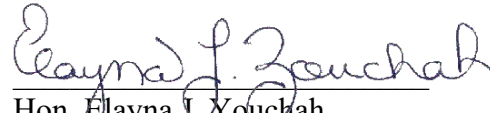
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IT IS SO ORDERED.

Dated: May 23, 2025


Hon. Elayna J. Youchak
United States Magistrate Judge